

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:) Chapter 11
)
EBRO REAL ESTATE HOLDINGS, LLC) The Honorable Eugene R. Wedoff
)
Debtor.) Case No. 09-10104

**BANK OF AMERICA'S WITNESS LIST FOR HEARING ON
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Pursuant to that certain Trial Order dated as of September 18, 2009 (Docket No. 72), Bank of America (the “Bank”), a secured creditor of EBRO Real Estate Holdings, LLC (the “Debtor”), hereby identifies the following persons as its witnesses at the evidentiary hearing (the “Hearing”) scheduled by this Court on the Bank’s motion (Docket No. 61) to modify the automatic stay or, in the alternative, convert the Debtor’s chapter 11 bankruptcy case:

WITNESSES

1. Francisco Flores
Vice President
Bank of America
Special Assets Group
135 S. LaSalle Street, Suite 1025
Chicago, Illinois 60603

The Bank reserves its rights to (i) call one or more rebuttal witnesses, and (ii) counter-designate witnesses in its case in chief in relation to testimony elicited by the Debtor or any other party who the Court may allow to present evidence at the Hearing.

Dated: September 22, 2009

Respectfully submitted,

BANK OF AMERICA

By: /s/ Morgan M. Smith

ROBERT D. NACHMAN (#6185804)

MORGAN M. SMITH (# 6287435)

DYKEMA GOSSETT PLLC

10 S. Wacker Dr., Suite 2300

Chicago, Illinois 60606

Telephone: (312) 876-1700

Facsimile: (312) 876-1155

rachman@dykema.com

mmsmith@dykema.com